

July 31, 2012

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

COMPLAINT REGARDING POSTAL SERVICE OFFERING
ENHANCED SERVICES PRODUCT FOR COMPETITIVE
MAILBOXES AND COMMENT TO THE RESPONSE OF THE
UNITED STATES POSTAL SERVICE TO ORDER NO. 1366

DOCKET# MC2012-26

I am a small business owner who owns a Pak Mail Centers of America, Inc., packing and shipping franchise. Our system operates over 255 store locations around the US that offer and support United States Postal Services. We typically operate a business that has 1-2 part time employees in addition to myself and we are classified by the United States Postal Service (USPS), as a Commercial Mail Receiving Agency (CMRA). I am writing the Postal Regulatory Commission to object to the enhancements currently being offered by the Postal Service surrounding the PO Box services. These enhancements create an unfair competitive advantage for the USPS and they will have a negative impact on our sales should the PO Box enhancements become fully implemented.

Several enhanced PO Box services that are currently being offered are:

- Use of Post Office street address by Post Office Box renters.
- No requirement of PO Box designation when using Post Office Street address.
- Email notification of mail delivery.
- Private carrier parcel receiving.

These identical services to our Private Mailbox Service (PMB) create an unfair advantage for the USPS from both a cost

and service perspective. These advantages include but are not limited to:

- No 6 month mail handling requirement for departed or cancelled Post Office Box renters.
- Ability to file a change of address form.
- Free forwarding of mail.

Furthermore, the USPS desire to reduce mail delivery to 5 days per week while still providing delivery service to PO Box customers, and not allowing the same delivery to PMB customers, will again create a significant disadvantage to my business. My business will be seriously impacted should this proposal be approved.

It is unreasonable to expect a small business like myself to compete with an organization that gives itself regulatory advantages on competing products and services. Allowing Post Office box renters to use the Post Office street address

causes a misperception to merchants. USPS claims fraud is the reason some companies will not ship to a PO Box. Allowing use of the Post Office street address misleads merchants as to where they are shipping. The number sign (#) will become a well-known identifier of PO Boxes, but also label CMRA's as a PO Box since there will be no distinction between the two. This will seriously cause my business to decline due to the unfair competitive changes allowed by the USPS.

Receiving packages at the street address conflicts with USPS policy and procedure for getting a signature on accountable, insurable, and registered mail products. All of these changes do not justify a no-charge bundling of services. Any letter or parcel handled by USPS personnel needs to have a stamp on it and the extra handling of private carrier packages will have associated labor costs with no extra charge to Post Office box renters.

I am requesting that the enhanced PO Box services currently being offered and proposed by the Post Office cease by order of the commission.

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